



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKM/SPN/BDM

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 25, 2020

By ECF and Hand

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Alejandro Burzaco
Criminal Docket No. 15-252 (PKC)

Dear Judge Chen:

The government respectfully writes to request an amended briefing schedule in connection with the Motion to Stay Forfeiture Proceedings and related documents filed on February 20, 2020 by the law firm Norton Rose Fulbright US LLP on behalf of Full Play Group S.A. ("Full Play"). See ECF Dkt. Nos. 1309 and 1310. In its filings, Full Play indicates, among other things, that it opposes and is in the process of seeking to cause Datisa S.A. ("Datisa") to oppose the forfeiture of assets held in a frozen bank account in Switzerland (the "Swiss Account"). Counsel for Full Play have been consulted and consent to the briefing schedule proposed herein.

By way of brief background, on February 10, 2020, a Special Meeting of Shareholders of Datisa was held in Montevideo, Uruguay, during the course of which Full Play moved that Datisa appear in this Court to defend against the forfeiture of the Swiss Account. The motion failed. Full Play, as the Court will recall, is wholly owned by Hugo Jinkis and Mariano Jinkis, charged defendants who, since the time of the unsealing of the indictment on May 27, 2015, have declined to enter the United States and have thus far successfully evaded the jurisdiction of the Court in which this criminal case is pending.

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The government respectfully proposes, with Full Play's consent, that the Court allow 30 days from the date of Full Play's filing for the government to respond and 14 days from the date of the response for any reply by Full Play.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Samuel P. Nitze
M. Kristin Mace
Keith D. Edelman
Brian D. Morris
Assistant U.S. Attorneys
718-254-7000

cc: Clerk of Court (PKC) (by ECF)
Counsel of Record (by ECF)
Carlos Ortiz, Esq., Counsel for Full Play (by Email)
Counsel for the Shareholders of Datisa, S.A. (by Email)